

**Dennis W. Montoya Time Sheet -  
Manzanares v. Higdon  
CIV 05-00095**

4/8/2002	Review Client Intake Form Conduct online investigation	5.2
4/12/2002	Interview Client and MM re events; memo to file; discussion of contract; sent K home for review	3.5
4/12/2002	research on wrongful detention	3.1
4/13/2002	meeting with client review results and discuss case, retained.	4.1
4/13/2002	Met with paralegal bcc re initial investigative plan - who knows defendant? Directed him to contact investigators through [redacted]	2.1
4/14/2002	met with paralegal re garding results of investigation	1.5
4/15/2002	met with investigator [redacted] assigned tasks walked him through case basics and discussed needs	2.2
4/16/2002	strategy meeting with consulting expert memo to file and Telephone call to paralegal	6.1
4/24/2002	continued legal research regarding possible framing of case issues	3.5
4/28/2002	meet with investigator, joint call to client, new instructions to investigator, memo to file email to paralegal	4.2
4/29/2002	Telephone call client re questions and status	1.8
4/29/2002	email paralegal research request (mvd)	0.2
4/30/2002	read and review email from paralegal regarding request	0.2
1/2/2005	meet with paralegal regarding issues to be aware of for danny manzanares' deposition, review file and Telephone call to client	5.4
1/2/2005	Depo preparation Danny Manzanares	4.2
1/3/2005	Depo preparation Danny Manzanares	4.0
1/3/2005	review file meet with paralegal regarding information for danny deposition, memo to file	3.2
1/4/2005	Danny Depo Prep cont.	4.3
1/5/2005	Meet with paralegal and review issues for Miguel Rick Maestas depostions	2.2
1/5/2005	Maestas depo prep	5.1
1/6/2005	Manzanares Depo incl. prep review after memo on strategy thoughts to file tc potential witness	7.7
1/6/2005	Manzanares Depo: Rick Maestas, meet with client afterwards, memo to file and em to paralegal	7.2
1/6/2005	email to CA regarding Expert Witness Deadline	0.1
1/6/2005	letter from CA regarding Plaintiff motion to Amnd Complaint	0.1
1/7/2005	meet with investigator, meet with paralegal, teleconference with paralegal and client and memo to file, email to ALS	5.5
1/8/2005	read and review response from ALS, email to paralegal additional task	0.5
1/8/2005	memo to file regarding outcome of depositions and potential problems/strengths of deposition testimony	2.8
1/9/2005	email to investigator, possible info he could find to help case	0.2
1/10/2005	Meet with client to answer city discovery	6.5

1/14/2005	letter from CA regarding City of Albuquerque, SOP manual	0.2
1/27/2005	Finalized Higdon Complaint; Filed	2.4
2/17/2005	review return of service	0.1
3/10/2005	Review answ from defendant; memo to file; tc client; em to paralegal and to investigator	5.2
3/11/2005	meet with investigator to discuss preliminary findings, memo to file	4.3
3/11/2005	Review Init Sched Order and calendaring; email to client and paralegal	1.1
3/12/2005	meet with recommended police practice expert discuss facts of the case direct areas of inquiry, strategy	4.4
3/19/2005	letter to Danny sending Initial Scheduling Order	0.1
3/19/2005	letter to Danny sending Reply supp. Summ judg, ANS Plaintiff's complaint	0.1
4/15/2005	Review initial discl from defendant and memo to file tc client	2.1
4/18/2005	review initial disclosures from prior case, compare to new disclosures, notes and memo to file	
4/18/2005	Pltf portion of pdp	1.2
4/20/2005	Fed.R.Civ.P.16 conference before LFG (and prep / client explanation TC after)	3.1
4/20/2005	HEARING: Rule 16 Scheduling conference and prep	2.0
4/21/2005	meet with police expert decide not to proceed with use as named expert, but consulting instead, review and discuss opinions and considerations for trial and for discovery plan	4.1
4/23/2005	Review file and prepare init discs; TC client	3.9
4/25/2005	Review order adopting ptdp	0.5
4/25/2005	Review LFG discovery order and calendar, tc to paralegal	0.8
4/25/2005	Finalize init discs	0.3
4/25/2005	Prepare and file cert of service init discs	0.3
4/25/2005	letter from Judge Garcia, Reassignment of Discovery Time-period, per Jdg. Garcia	0.1
4/25/2005	letter to CA sending Certificate of Service	0.1
4/25/2005	letter to Danny sending Certificate of Service	0.1
4/26/2005	meet with investigator regarding findings and memo to file, em to paralegal	4.8
4/27/2005	Review IPTR, calendar and TC client and TC paralegal	0.5
4/27/2005	Call of the Calendar	1.1
5/9/2005	letter to Danny sending Order to vacate trial settings, ordr assign standard track	0.1
5/15/2005	met with client	0.8
5/17/2005	letter to Danny sending ordr grant plaintiff unopposed motion to ext. discovery	0.1
5/20/2005	review APD general orders and memo to file	4.0
5/21/2005	review photos memo on possible use at trial to file	1.8
5/21/2005	send APD general orders to consulting expert with memo on questions	0.3
6/16/2005	review response from expert, memo to file, Telephone call to client	2.1
7/20/2005	letter to CA regarding motion and order on IA file	0.1
7/25/2005	letter to CA regarding motion and order on IA file	0.1

7/25/2005	letter from CA regarding Joint Motion for Protective Order	0.1
8/12/2005	met with client re status etc	0.9
8/30/2005	letter to CA regarding motion and order extending discovery	0.1
8/31/2005	letter to CA regarding confirm receipt of faxed letter from Mr. Montoya	0.1
9/11/2005	Meet with ALS review file together determine initial strategy, memo to file	6.8
9/12/2005	review EOA by ALS	0.1
9/14/2005	Prepare motion to extend discovery and other deadlines	1.9
9/14/2005	Begin Written discovery to Defendant	6.4
9/14/2005	letter to CA sending first set of discovery requests	0.1
9/14/2005	letter to CA sending motion and order to extend	0.1
9/15/2005	Draft and finalize discovery to def	6.6
9/15/2005	Send disc reqs to ALS to review	0.1
9/16/2005	File cert on disc reqs	0.1
9/19/2005	Review order granting motion to extend discovery; calendar	0.2
9/23/2005	letter to CA regarding depo dates	0.2
9/27/2005	letter to CA regarding depo dates again	0.1
10/1/2005	met with client discuss discovery budget	0.9
10/3/2005	letter to CA regarding depositions on 13th pt 2	0.1
10/4/2005	letter from CA regarding time extension, concerning discovery	0.1
10/5/2005	review and memo to file and memo to client re city discovery reqs	4.3
10/17/2005	email to CA regarding disc ext for defendants	0.1
10/18/2005	letter from Kathryn Levy, regarding Request to Inspect Public Records	0.1
10/27/2005	Meet with client to answer city discovery	5.9
10/27/2005	Telephone call to investigator	0.8
10/27/2005	Telephone call to consulting expert regarding answers and investigators thoughts	1.3
10/28/2005	Meet with client finish discovery responses	6.2
11/1/2005	Meet with ALS, Client and paralegal go over answers from city, memo to file, EM to paralegal	4.8
11/3/2005	Finalize and serve responses to def's disc reqs	2.8
11/3/2005	review and approve def requested prot order	0.8
11/3/2005	letter to CA regarding depositions on 13th	0.1
11/3/2005	letter to CA sending answers to discovery	0.1
11/4/2005	Review Answers & Objections by Defendant Higdon	3.1
11/7/2005	review signed prot order	0.1
11/7/2005	letter to Danny sending Protective Order for contents of the personnel	0.1
11/10/2005	letter to CA regarding motion and or and dates	0.1
11/22/2005	letter from CA regarding to Judge Lorenzo F. Garcia	0.1
11/22/2005	letter from CA regarding time extension, concerning discovery	0.1
11/28/2005	letter from Judge Lorenzo F. Garcia to Kathryn Levy	0.1
11/28/2005	letter to Danny sending Protective Order for contents of the personnel	0.1
11/29/2005	review LFG order on info to be disclosed from personnel file	0.2
12/1/2005	letter from CA to Judge Garcia	0.1
12/3/2005	Review documents submitted, TC KL, TC client, memo to file	2.4

12/5/2005	review of docs gathered from other pltf counsel compare with produced docs, memo to file, Telephone call to investigator	4.4
12/10/2005	meet with investigator, memo to file, email to paralegal, Telephone call to ALS regarding investigator's results and recommendation. Telephone call consulting expert on police practices.	6.5
12/11/2005	letter to CA sending motion for extension for review	0.1
12/12/2005	letter to Danny sending motion for extension of time	0.1
12/13/2005	letter to CA sending unopposed motion for extension of time	0.1
12/18/2005	Prepare motion to extend discovery deadline for sole purpose of taking depositions	0.8
12/27/2005	Rev LFG order granting motion to extend discovery deadline	0.1
12/29/2005	Meeting with paralegal and review of documents gathered by paralegal from other attys re Higdon's bad acts and pattern and method of interacting with public as well as testifying - memo to file	7.2
1/9/2006	letter to CA sending Notice of deposition	0.1
1/9/2006	letter to Paul Baca sending Notice of deposition	0.1
1/10/2006	letter to Danny sending Notice to take deposition	0.1
1/26/2006	Review PTO	1.8
1/28/2006	prepare motion to continue (draft) for approval	0.3
1/29/2006	letter to Paul Baca, letterR cancellation of hearing, no Court Rep. necessary	0.1
2/1/2006	Review order granting continuance	0.1
2/1/2006	letter to Danny sending Pre-Trial Order/PDP	0.1
2/3/2006	Review order setting claendar settings, calendar, em to client	0.4
2/10/2006	letter to Danny sending Notice, 'for your information'	0.1
2/15/2006	letter to Danny sending new address, Pre-Trial Order/PDP	0.1
3/3/2006	meet with client regarding case updates plan of attack	2.1
3/14/2006	meet with investigator re new tasks	0.4
3/19/2006	Telephone call from investigator	0.3
3/24/2006	letter to Paul Baca sending Notice of deposition	0.1
3/27/2006	letter to Danny sending Notice to take deposition	0.1
3/29/2006	letter to CA sending Amended Notice of Deposition for David Saladin	0.1
3/29/2006	letter to Paul Baca sending Amended Notice of Deposition for David Saladin	0.1
4/12/2006	met with client re case update	0.7
5/10/2006	review file and materials relevant to offensive summary judgment, outlining, memo to file, email questions to paralegal. Telephone call to client. Telephone call to ALS re depo answers.	4.0
5/11/2006	Begin preparing motion for sj, legal research	4.5
5/12/2006	westlaw research re sj	6.4
5/12/2006	letter to Chris Lane regarding witness	0.1
5/12/2006	letter to Danny sending 'correspondence'	0.1
5/13/2006	westlaw research and drafting on msj	7.2
5/14/2006	work on MSJ research, meet with ALS	6.8
5/15/2006	Finalize MSJ and file	4.1
5/15/2006	letter to CA sending motion SJ	0.1

5/16/2006	letter to Danny sending 'motion'	0.1
5/18/2006	review motion to strike, review correspondence - NOT the deal, research - tc client	5.8
5/31/2006	review response to msj/motion to strike review file regarding agreements, Telephone call to paralegal, Telephone call to client and research file regarding propriety of striking	6.0
6/6/2006	draft mo extend time to file response to motion to strike	0.8
6/7/2006	letter to CA sending motion to enlarge time to respond to motion strike	0.1
6/7/2006	letter to CA sending motion to enlarge time to respond to motion strike	0.1
6/8/2006	review order granting extension	0.1
6/13/2006	Draft and file response to motion to strike	4.0
6/13/2006	review order by Johnson granting motion to strike motion, in plan research on appealability and reversability, memo to file	3.8
6/13/2006	letter to CA sending Plaintiff's Response	0.1
6/14/2006	letter to Danny sending new address , Montoya, motion for Individ'zed, Sequest. Voir Dire, & for Case-Specific Juror Questionnaire	0.1
6/15/2006	letter from CA regarding planned motion of points and authorities in support thereof	0.1
6/15/2006	letter to CA regarding draft of the ind seq motion	0.1
6/15/2006	letter to CA regarding position on motion ind seq voir dire	0.1
6/16/2006	letter to CA regarding what's your position on motion in limine No. 1	0.1
6/18/2006	stratgy session with consulting expert re: pitfalls and awareness issues for motions in limine identified	4.4
6/18/2006	letter from CA regarding defendant's position on motion in limine("I am in receipt of your letter from 6/16/2006...	0.1
6/19/2006	researrch on keeping out "life in jeopardy" and "first responder" testimony	5.3
6/20/2006	Draft and file motion in limine no 1 life in jeopardy	4.1
6/20/2006	letter to CA sending motion in limine no 1	0.1
6/20/2006	letter to Danny sending correspondence, motion in limine	0.1
6/22/2006	review def response to mo in limine no. 1	0.8
8/7/2006	review order denying mo in limine no. 1	0.4
8/7/2006	begin research on motion for individual, sequestered voir dire	4.1
8/8/2006	review notice of Jury selection	0.1
8/16/2006	review defense trial exhibit list	0.2
8/16/2006	prepare file exhibit list	1.7
8/16/2006	work on Motion to individual sequestered voir dire	3.2
8/17/2006	finalize and file motion for individual, sequestered voir dire	5.8
8/17/2006	draft and submit witness list	1.8
8/17/2006	letter to CA sending motion Ind Voir Dire and Witness and Exhibit List	0.1
8/17/2006	letter to CA sending position on motion in Limine No. 2 - DUI	0.1
8/17/2006	letter to Danny sending trial notice	0.1
8/18/2006	meet with paralegal regarding thoughts/research unrelated arrest other areas discussed for potential motions in limine - discuss tactics regarding motions, memo to file and email to ALS	3.4

8/18/2006	draft - mo in limine no 2 - unrelated misdemeanor arrest	2.2
8/18/2006	draft - mo in limine no 3 - nature of allegation against Miguel Maestas	2.5
8/18/2006	letter from CA regarding Defendant's planned motions in limine	0.1
8/18/2006	letter to Danny sending PL motion in limine	0.1
8/19/2006	letter from CA regarding Defendant's planned motion in Limine #3	0.1
8/20/2006	draft - mo in limine no 4 - request that court take judicial notice of certain facts	1.9
8/20/2006	Work with ALS on jury instructions	7.1
8/21/2006	Finalize and submit jury instructions	1.8
8/21/2006	Review def mo in limine no. 1 to excl. internal affairs file, research	1.4
8/21/2006	review def mo in limine 2 to exclude SOPS, research memo to file EM to paralegal	3.1
8/21/2006	review defendant mo in limine 3 to exclude evidence, testimony or argument that Officer Higdon's actions were motivated by plaintiff's race, tc client, tc paralegal, em ALS and review em response ALS	2.9
8/21/2006	Pre-Trial Conference/J. Johnson	1.2
8/21/2006	letter to CA regarding proposed statement of the case	0.1
8/21/2006	letter to CA sending Motions in Limine 2 and 3	0.1
8/21/2006	letter to Danny sending motion in limine	0.1
8/22/2006	Review order on motions in limine	0.1
8/22/2006	Review memo from consulting expert, memo to file and telephone call to client	2.6
8/22/2006	met with client to discuss pretrial conference and order and motions in limine	1.9
8/22/2006	Telephone call to consulting expert question based on client's observation	0.3
8/23/2006	Review defendants requested jury instructions. E-mail to paralegal. Memo to file Westlaw research	2.2
8/23/2006	letter to CA sending PL requested jury instr	0.1
8/23/2006	letter to Danny sending PL requested jury instr	0.1
8/25/2006	read and review Defendant's response to motion in limine number two	1.9
8/25/2006	Read and review defendant's response to motion in limine number three	1.2
8/25/2006	Read interview defendant's response to plaintiff's motion in the many number four, Westlaw research, e-mail to ALS, memo to file	2.5
8/25/2006	Review of defendant's objection to plaintiff's proposed jury instructions	1.3
8/27/2006	read and review ALS prepared voir dire, e-mail with suggestions, Telephone call with paralegal regarding voir dire	2.1
8/28/2006	legal research and draft response to motion in limine number three	3.8
8/28/2006	Prepare plaintiff's objections to the defendant's proposed voir dire teleconference with ALS and paralegal	3.5
8/28/2006	Research draft, and finalize reply in support of motion in limine number three by plaintiff (in teleconference with ALS and paralegal, as well as individually)	5.1
8/28/2006	HEARING: Motions in Limine / J. Johnson	4.5
8/28/2006	letter to CA sending Objections to Defendant's Proposed Voir Dire	0.1
8/28/2006	letter to CA sending plaintiff's voir dire	0.1
8/28/2006	letter to CA sending REP to response to plaintiff's motion in Limine no 3	0.1



8/28/2006	letter to CA sending response to Defendant motion in limine number three	0.1
8/28/2006	letter to Judge Johnson sending PL Proposed motion in limine	0.1
8/28/2006	letter to Judge Johnson sending plaintiff objections to Defendant proposed voir dire	0.1
8/28/2006	letter to Judge Johnson sending objections to Defendant's proposed voir dire	0.1
8/28/2006	letter to Judge Johnson sending reply to response to Plaintiff's motion in limine number three	0.1
8/29/2006	Review J. Johnson's order on motions in limine, prepare "open the door," etc. strategy memos for the file. Review research by paralegal. Meeting with ALS and client.	3.5
8/30/2006	Review order setting trial date	0.1
8/30/2006	Review or on plaintiff's motion in limine number one	0.1
8/30/2006	Review order on defendant's motion in limine number one	0.1
8/30/2006	review file and research regarding def's motion in limine number one	3.1
9/1/2006	read and review Defendant's objections to plaintiff's voir dire and memo to file	4.1
9/5/2006	Read and review order by Judge Johnson on defendant's objection to plaintiff's requested jury instructions. Westlaw research. Telephone call to client. Telephone call to ALS. E-mail to paralegal. Review response from paralegal. Telephone call to ALS.	6.0
9/5/2006	Review Judge Johnson's order regarding court's proposed jury instructions.	0.3
10/17/2006	Review the Judge's order regarding jury instructions and Telephone call to ALS	1.0
10/18/2006	Review order setting hearing on both sides objections to voir dire etc. Telephone call to client. Telephone call to her legal. E-mail to ALS	0.8
10/18/2006	letter to KL regarding subs and cooperating	0.1
10/19/2006	Partial Mock Trial (ALS and paralegal present)	6.2
10/20/2006	Meet with paralegal and ALS re trial strategy	4.9
10/20/2006	Hearing on MO in Limine J. Johnson	2.3
10/20/2006	HEARING: Parties' Objections to Voir Dire and Defendant's Objections to Plaintiff's Exhibits / Judge Johnson	2.4
10/21/2006	TRIAL Prep with ALS paralegal and client	9.1
10/21/2006	MEETING: with Client, status strategy updates costs	3.2
10/22/2006	Trial prep continued drafting opening and practicing opening reviewing jury instructions	8.4
10/23/2006	Trial Day 1 - and prep	10.3
10/24/2006	Trial Day 2 - mistried, meeting with client and ALS and paralegal and research to determine ruling is not reviewable.	11.4
10/24/2006	letter to KL regarding settlement offer	0.1
10/25/2006	meet with client review trial notes	2.3
10/31/2006	letter to Danny sending order of mistrial	0.1
11/28/2006	Telephone call from client	0.3
12/6/2006	letter to Danny sending new address	0.1
12/13/2006	letter to Danny sending Notice of Jury Trial	0.1

1/3/2007	HEARING: Calendar Call / Judge Johnson	0.8
1/4/2007	Review order by Judge Johnson granting plaintiff's motion to continue trial	0.1
1/11/2007	review research provided by other pltf counsel relevant to Manzanares	4.8
1/25/2007	letter to Danny sending Notice of Jury Trial	0.1
2/20/2007	letter to KL sending 1. Plaintiff's emergency Unopposed Motion to Vacate and Reschedule the January Trial Setting.	0.1
2/22/2007	letter to Danny sending Rescheduled trail date	0.1
3/1/2007	Met with paralegal re outstanding investigative and research issues, em memo to client	3.4
3/3/2007	focus panel on damages presentation	4.1
3/4/2007	read and review depositions, prep for examination and cross	4.0
3/6/2007	read and review investigative file, cads, sops, discuss with consulting expert, memo/outline for trial to file	7.3
3/7/2007	examination prep for trial, meet with paralegal regarding questioning suggestions, etc	6.2
3/9/2007	work on developing themes for trial presentation, review trial presentation technique texts, discuss strategy with ALS	6.5
3/10/2007	Review depositions, teleconference with ALS and paralegal regarding which portions should be used from which depositions. Telephone call to client. Note to file. Designate portions of Chester's deposition	5.4
3/10/2007	letter to KL regarding order of witnesses for second trial	0.1
3/10/2007	letter to KL regarding subpoena for C Chester for second trial	0.1
3/11/2007	Meet with ALS, paralegal, and client work through plan of attack, direct and cross (mock) of client, practice opening, practice closing with mock jurors	9.3
3/12/2007	Trial, including questioning witnesses, legal research, preparing before and after	12.4
3/13/2007	Trial, including questioning witnesses, legal research, preparing before and after	14.3
3/14/2007	Trial, including questioning witnesses, legal research, preparing before and after	11.3
3/14/2007	letter to Thomas Garret	0.1
3/15/2007	Jury note	0.9
3/15/2007	Argument re rule 50	0.7
3/21/2007	Review order on briefing schedule for rule 50 motions	0.2
3/21/2007	letter to Danny sending Jury Instr, Clerks mins	0.1
4/5/2007	Westlaw research, prepare research plan, memo to file, e-mail to ALS re-rule 50 motion by plaintiff	7.4
4/7/2007	legal research for rule 50 motion	5.2
4/9/2007	legal research for rule 50 motion	5.0
4/10/2007	legal research for rule 50 motion	6.4
4/11/2007	letter to Danny sending Order denying motion for New Trial	0.1
4/12/2007	Complete first draft of rule 50 motion, e-mail to paralegal for additional inclusion of material gathered by paralegal and Telephone call to ALS regarding rule 50 motion. Telephone call to client regarding rule 50 motion.	7.9



4/14/2007	Review responses from paralegal and ALS regarding rule 50 motion complete second draft and e-mail to paralegal and ALS	4.7
4/15/2007	legal research and drafting on rule 50 motions	8.5
4/16/2007	research, drafting and finalize rules 50 motion including suggestions by paralegal and ALS	8.8
4/16/2007	Read and review defendant's rule 50 motion. Meet with ALS and paralegal. Telephone call to client regarding meeting and opinion. Memo to file and strategy memo to ALS and paralegal	7.8
4/17/2007	Conduct Westlaw research regarding plan of attack for appeal (if necessary), and defendant's claims.	3.6
4/18/2007	Meet with paralegal to discuss research assignments go over plan of attack to be ready in case of need for appeal	2.1
4/23/2007	letter to Danny sending Defendant's Memailorandum in Support of His Rule 50 Motion for Judgment as a Matter of L	0.1
5/7/2007	Read and review order by Judge Johnson denying plaintiff's rule 50 motion begin memo to file. Telephone conference with paralegal, client, ALS.	5.9
5/9/2007	Conduct Westlaw research regarding recent cases involving similar facts nationwide appeals. Memo to file regarding research results. Tell conference with paralegal and client.	7.8
5/11/2007	Meet with ALS regarding plan and strategy	3.5
5/12/2007	Read and review paralegal's results regarding planned appeal, memo to file	3.0
5/14/2007	Receive and review judgment in favor of defendant against the plaintiff	0.1
5/14/2007	Westlaw research regarding the need to file a renewed motion given that the judgment was not entered at the time	2.1
5/18/2007	letter to Danny sending Order Lifting Stay and Dismissing Case with Prejudice	0.1
5/29/2007	File renewed rule 50 motion	0.6
5/29/2007	letter to Court Clerk sending Post Trial Motions	0.1
5/31/2007	Review order by Judge Johnson denying renewed motion pursuant to rule 50	0.1
6/6/2007	letter to Danny sending Order denying Plaintiff's Motion for New Trial Pursuant to Rule 59(a)	0.1
6/17/2007	meet with paralegal, plan of attack reviewed my westlaw findings and assigned research tasks	3.1
6/18/2007	Draft and file notice of appeal. pay filing fee	0.5
7/2/2007	letter to Danny sending Preliminary record, docket sheet, notice of appeal	0.1
7/16/2007	Complete transcript order form	0.3
7/17/2007	file transcript order form	0.1
8/2/2007	Meeting with client, ALS and paralegal re status on research and place on map of attack - thoughts for creatively move case through appeal - discussing other possible avenues of attack	5.4
8/13/2007	Meeting with paralegal re findings, em to client re results	1.8
8/19/2007	teleconference with client and ALS re thoughts on research and argument theory so far	1.3
9/20/2007	receive transcripts from court reporter	0.1

9/21/2007	review transcripts of second trial, begin strategy memos to file	7.3
9/25/2007	review letter informing ct app transcript done	0.1
9/26/2007	read and review transcripts for appeal, outlining	6.0
9/27/2007	read and review transcripts for appeal, outlining	6.4
9/28/2007	read and review transcripts for appeal, outlining	4.8
9/30/2007	meet with paralegal and assign research task, read and review transcripts, tc to client regarding events, tc to ALS regarding questions about trial events	5.8
10/2/2007	teleconference with paralegal and ALS regarding case law for appeal	1.5
10/8/2007	review paralegal's results from research assignment, memo/outline, conduct onlie research	4.4
10/11/2007	legal research for appeal	3.5
10/15/2007	legal research for appeal, drafting appellate brief	4.3
10/18/2007	legal research for appeal, read and review transcripts	6.2
11/5/2007	Telephone call to KL office re: position on motion	0.1
11/5/2007	Telephone call to paralegal regarding deadline for opening brief	0.2
11/12/2007	drafting for appeal brief	4.0
11/15/2007	meet with client discuss appeal, questions on underlying events	4.4
11/18/2007	read and review depo and trial transcripts, memo for appeal brief, Telephone call to ALS	5.5
12/20/2007	Prepare appendix and table of contents for appendix, get produced	5.8
12/22/2007	drafting of appeal brief	6.2
12/26/2007	Finalize appeal brief-in-chief, prep for delivery to CTA	7.8
2/27/2008	Telephone call w/ ALS regarding impact of Defendant's failure to file an answer brief, Telephone call to clerk's office, legal research, memo to file. Telephone call to client	3.1
11/26/2008	read and review Defendant's response brief, notes to file	6.4
11/29/2008	research for reply brief	6.5
12/2/2008	research for reply brief, outlining	5.8
12/3/2008	meet with paralegal regarding research tasks, conduct legal research, outlining for reply brief	8.4
12/4/2008	meet with paralegal reviewing his results and discussing my findings, memo to file, Telephone call to ALS	9.0
12/6/2008	drafting reply brief	6.0
12/7/2008	drafting reply brief	8.8
12/8/2008	Finalize and submit reply brief	8.3
1/7/2009	read and review file in prep for appellate argument	7.0
1/8/2009	read and review depo transcripts in prep for oral argument	5.4
1/9/2009	read and review trial transcripts and practice possible questioning with paralegal	9.5
1/10/2009	Mock/moot Appeal Hearing practice	6.1
1/11/2009	Drive to Denver for Appellate Argument	8.1
1/12/2009	Appeal HEARING: Oral Argument / Judges Tacha, Ebel, and Lucero (and prep)	4.0
1/13/2009	Drive to Albuquerque from Denver following Aplt hearing	8.2

8/10/2009	read and review 10th cir. opinion and memo to file	4.2
8/11/2009	met with client explaining order	1.3
8/12/2009	Telephone call to ALS regarding order and discussing strategy	1.0
8/13/2009	review file, refresh, review old jury instructions memo to file on major changes to ji's and thoughts for strategy and from ALS	4.4
8/18/2009	read and review order transferring case to J. Parker	0.1
8/20/2009	review notice from ct setting dates	0.1
9/9/2009	meet with paralegal and prepare for pretrial conference review CADs and read part of 2nd trial transcript, review prior orders on motions in limine	6.4
9/10/2009	HEARING: Final Pretrial Conference / Judge Parker	3.2
9/10/2009	read and review transcripts of trial, direct examination outlining and prep, Telephone call to client, email to paralegal	6.0
9/11/2009	review order setting trial date	0.1
9/11/2009	review CTA mandate (filed in district ct.)	0.1
9/11/2009	meet with procedures expert re questions for Higdon, memo to file, em to ALS	5.2
9/13/2009	travel to meet with new witness (Ed Manzanares)	1.6
9/13/2009	meet with Ed Manzanares discuss planned areas of questioning explain process	3.1
9/13/2009	return travel to Albuquerque	1.6
9/14/2009	filing notice of additional witness (Ed Manzanares)	0.1
10/19/2009	review Defendant's witness list	0.1
10/19/2009	review Defendant's exhibit list	0.1
10/19/2009	draft and file witness list after Telephone conference with paralegal and ALS	1.8
10/19/2009	draft and file exhibit list	0.2
10/21/2009	review Defendant's proposed jury instructions, research law on proposed instructions, memo to file and Telephone call to ALS	4.8
10/21/2009	Telephone call from client regarding plan and questions about trial	0.7
10/22/2009	review Defendant's proposed voir dire, Telephone call to paralegal to assign research, Telephone call from paralegal regarding results, read and review email from paralegal	3.0
10/22/2009	Review defendant's submitted a proposed voir dire and proposed exhibits, Telephone call to ALS, Telephone call to paralegal	2.1
10/23/2009	review motion to vacate, Telephone call to client	2.3
10/24/2009	strategy meeting with consulting expert and hashing out questions, getting expert's perspective	6.5
10/24/2009	memo to file on information from meeting with consulting expert	2.3
10/27/2009	research and drafting response to motion to vacate and file	2.3
10/28/2009	trial (prep before and meeting with client after mistrial declared)	12.1
11/28/2009	research and drafting motions in limine (including researching J. Johnson's prior rulings)	3.8
11/29/2009	finalizing and filing motions in limine	2.2
12/6/2009	read transcripts in prep for trial on damages (from second and third trials)	7.2
12/6/2009	read transcripts in prep for trial on damages (from second and third trials)	4.4

12/7/2009	work with client on questioning emphasis on being prepared for cross-examination, memo/outline and meet with paralegal, Telephone call to ALS	8.7
12/8/2009	Mock jury presentation, refine questions, work with client on preparing for cross-examination, etc.	9.0
12/9/2009	trial prep research regarding jury instructions, read and review trial transcripts, prep questioning outline, meet with client, meet with ALS	9.2
12/10/2009	trial (incl. prep before and after in court time as well as in court time)	12.2
12/11/2009	trial (incl. prep before and after in court time as well as in court time)	8.5
12/15/2009	Meet with client explain process and usual time to get judgment money, meet with office staff regarding filing wrap up. Meet with ALS regarding plan for fee billing, etc. Memo to file on all areas of possible appeal for defendant and counter-arguments, case end memo.	7.1

**Total Hours Spent on Case**  
**1004.1**

**Subtotal (at \$250/hr)**  
**\$251,025.00**

**NM GRT**  
**\$16,630.41**

**Total**  
**\$267,655.41**